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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ROSEMARY GARITY,)
Plaintiff,) Case No. 2:11-cv-01805-RCJ-CWH
v.)
USPS PMG PATRICK DONAHOE,)
Defendant.)

UNOPPOSED MOTION FOR EXTENSION OF TIME
(First Request)

The Federal Defendant USPS PMG Patrick Donahoe, by and through Daniel G. Bogden, United States Attorney, and Justin E. Pingel, Assistant United States Attorney for the District of Nevada, respectfully requests an extension of time for the Federal Defendant to appear and file an Answer or otherwise respond in the above-entitled case until on or before January 18, 2012. The Federal Defendant's Answer or other response is currently due on or before January 11, 2012.

In support of the instant Motion, the Federal Defendant submits the following:

1. This Motion is brought in order to accommodate the undersigned counsel for the Federal Defendant.

2. On November 9, 2011, Plaintiff filed the instant lawsuit and seeks relief pursuant to Title VII of the Civil Rights Act of 1964. *See* Complaint.

3. The requested extension of time is necessary in order for Government counsel to fully consult with agency counsel assigned to this case. Due to the holiday schedule, neither counsel has been able to provide the other with sufficient time to devote to discussing this case.

4. On January 10, 2012, undersigned counsel for the Federal Defendant contacted Plaintiff to request an extension of time to Answer or otherwise respond to Plaintiff's Complaint until on or before January 18, 2012. Plaintiff did not oppose the requested extension.

5. The instant motion is filed in good faith and not for the purposes of delay.

WHEREFORE, for the above reasons, Federal Defendant respectfully requests the instant Motion extending time to appear and file an Answer or otherwise respond in the above-entitled case until on or before January 18, 2012, be granted.

Respectfully submitted this 10th day of January 2012.

DANIEL G. BOGDEN
United States Attorney

/s/Justin Pingel
JUSTIN E. PINGEL
Assistant United States Attorney

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: January 17, 2012

PROOF OF SERVICE

I, Justin E. Pingel, AUSA, certify that the following individual was served with the **UNOPPOSED MOTION FOR EXTENSION OF TIME** on this date by the below identified method of service:

U.S. Mail

Rosemary Garity
3231 N. Florenza Street
Pahrump, Nevada 89060

DATED this 10th day of January 2012.

/s/ Justin E. Pingel
JUSTIN E. PINGEL
Assistant United States Attorney